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February 19, 2008

Marlene H. Dortch, Office of the Secretary Federal Communications Commission 445 12th Street, SW Suite TW-A325 Washington, D.C. 20554

Re: EB Docket No. 06-36

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2007

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of FCC rules, there is submitted herewith, on behalf of Carolina West Wireless, Inc., the carrier's 2007 CPNI certification with accompanying statement. The documents are submitted in accordance with the directives set forth in the FCC's *Public Notice*, DA 08-171, EB Docket No. 06-36, released January 29, 2008.

Should any questions arise regarding this submission, please contact the undersigned.

Very truly yours,

Pamela L. Gist

Enclosures

cc: Enforcement Bureau, FCC (2)

Best Copy and Printing, Inc. (1)



Marlene H. Dortch, Office of the Secretary Federal Communications Commission 445 12th Street, SW Suite TW-A325 Washington, D.C. 20554

> Re: Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2007 EB Docket No. 06-36

> > Form 499 Filer ID: 801552

CERTIFICATION

I. Slayton S. Stewart, hereby certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures effective during the calendar year 2007 that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64:2001 *et seq.* of the rules of the Federal Communications Commission

Attached to this certification is an accompanying statement that (i) explains how the company's procedures ensure that the company is in compliance with the requirements set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules, (ii) explains any actions taken against data brokers during the past year, (iii) reports information known to the company regarding tactics pretexters may be using to attempt access to CPNI, and (iv) summarizes all customer complaints received in the past year concerning the unauthorized release of CPNI.

Name: Slayton S. Stewart Title: Chief Executive Office

Date: February 15, 2008



Company Name ("Carrier"): Carolina West Wireless, Inc.

Form 499 Filer ID: 801552

Address: 1307 Curtis Bridge Road

P.O. Box 959

Wilkesboro, NC 28697

<u>STATEMENT</u>

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI")

- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier does not presently use its customers' CPNI in sales and marketing campaigns. Should it begin to do so, Carrier will maintain a record of its and its affiliates' sales and marketing campaigns that use CPNI. In that context Carrier will maintain a record of any and all instances where CPNI is disclosed or provided to third parties, or where third parties are allowed access to CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Should Carrier begin to use CPNI for marketing purposes, it will establish a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and will maintain records of carrier compliance for a minimum period of one year. Carrier's sales personnel will obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process will ensure that opt-out elections are recorded and followed.
- Carrier has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier's retail locations or otherwise and in connection with these procedures, Carrier has established a system of passwords and back-up authentication methods which complies with the requirements of applicable Commission rules.



- Carrier has established procedures to ensure that customers will be immediately notified
 of account changes including changes to passwords, back-up means of authentication for
 lost or forgotten passwords, or address of record.
- Carrier took the following actions against data brokers in 2007, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: None
- The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI: None
- The following is a summary of all customer complaints received in 2007 regarding the unauthorized release of CPNI:
 - Number of customer complaints Carrier received in 2007 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: None
 - - Description of instances of customer complaints, improper access or disclosure: Not applicable

0 Number of other instances of improper access or disclosure